

REMARKS

The above Amendments and these Remarks are in reply to the Office Action mailed May 6, 2005 (the "Office Action"). Claims 1, 2, 4, 8-10, 13 and 15-17 were pending in the Application prior to the outstanding Office Action. In the Office Action, claim 17 was rejected under 35 U.S.C. §112, claims 1, 4, 8-10 and 17 were rejected under 35 U.S.C. §102(a) and claims 14-16 were rejected under 35 U.S.C. §103(a). Claim 2 was objected to as being dependent upon a rejected base claim.

I. RESPONSE TO REJECTIONS UNDER 35 U.S.C. §112

On page 2 of the Office Action, the Examiner rejected claim 17 because of an insufficient antecedent basis for the limitation "said second port opening" in line 3. Applicants have amended claim 17 to clarify that claim 17 depends from claim 13, which recites a "second port opening." Therefore, Applicants respectfully request the Examiner to remove this rejection.

II. RESPONSE TO REJECTIONS UNDER 35 U.S.C. §102(a)

On page 2 of the Office Action, the Examiner rejected claims 1, 4, 8-10 and 17 under 35 U.S.C. §102(a) as being anticipated by U.S. Patent No. 6,281,516 issued to *Bacchi et al* ("*Bacchi*").

Bacchi discloses a dual load port system 10 that is able to receive and open two FOUPs 18 simultaneously. The base of the system 10 comprises a "a frame 12 to which two front or port plates 14 are attached." *Bacchi*, 4:16-17. Each port plate 14, which is a flat piece of material, is simply bolted to the frame 12. "Each front plate 14 supports one of two substantially identical load box interface systems 16." *Bacchi*, 4:17-18. Each port plate 14 has an opening 74 to mate with the port door 76. *Bacchi*, 5:12-13. Fig. 12 illustrates that the port door 76 is lowered just far enough to not obstruct the port opening 74, at which point, the port door comes to rest behind the port plate 14 (shown as hidden line 352). The load port system 10 disclosed in *Bacchi* comprises two load ports bolted to a single, common frame 12.

A. Independent Claim 1 is Patently Distinguishable Over *Bacchi*

Applicants have incorporated the limitations recited in claim 2 into claim 1. On page 5 of the Office Action, the Examiner indicated that a claim incorporating the limitations of both claims 1 and 2 would be in condition for allowance. Therefore, Applicants respectfully assert that the apparatus recited in amended claim 1 is not anticipated by *Bacchi*, and is in condition for allowance.

B. Dependent Claim 4 is Patently Distinguishable Over *Bacchi*

Dependent claim 4 depends directly or indirectly from independent claim 1. This dependent claim includes all of the limitations of the independent claim from which it depends. Applicants respectfully assert that dependent claim 4 is allowable for at least the reasons set forth above concerning independent claim 1.

C. Independent Claim 8 is Patently Distinguishable Over *Bacchi*

Claim 8 recites, among other things, a frame having:

“a structure having an exterior mounting surface secured to said front surfaces of said first and second elongated struts and an interior mounting surface secured to said rear surfaces of said first and second elongated struts, and providing a port door storage area located between said exterior mounting surface and said interior mounting surface;”

Bacchi does not teach a structure that provides “a port door storage area located between said exterior mounting surface and said interior mounting surface.” In contrast, *Bacchi* teaches mounting a conventional load port 16 to a frame 12. In *Bacchi*, the port door 76 of the load port 16 is simply lowered into the processing tool. The load port frame 12 in *Bacchi* does not include a “port door storage area” that the port door is lowered into. Therefore, Applicants respectfully suggest that the apparatus recited in claim 8 is not anticipated by *Bacchi*.

D. Dependent Claims 9-10 are Patently Distinguishable Over *Bacchi*

Dependent claims 9-10 depend directly or indirectly from independent claim 8. These dependent claims include all of the limitations of the independent claim from which they depend. Applicants respectfully assert that dependent claims 9-10 are allowable for at least the reasons set forth above concerning independent claim 8.

E. Dependent Claim 17 is Patently Distinguishable Over *Bacchi*

Dependent claim 17 depends directly or indirectly from independent claim 13. Claim 13 recites, among other things, a frame having:

“a structure having an exterior mounting surface secured to said front surfaces of said first, second and third elongated struts and an interior mounting surface secured to said rear surfaces of said first, second and third elongated struts, and providing a first port door storage area located

between said exterior mounting surface and said interior mounting surface and said first and second elongated struts and a second port door storage area located between said exterior mounting surface and said interior mounting surface and said second and third elongated struts;”

For at least the same reasons discussed above regarding claim 8, Applicants respectfully assert that claim 13 is not anticipated by *Bacchi*. Because claim 17 depends from claim 13, Applicants respectfully assert that claim 17 is also not anticipated by *Bacchi*.

III. RESPONSE TO REJECTIONS UNDER 35 U.S.C. §103(a)

On page 3 of the Office Action, the Examiner rejected claims 14-16 under 35 U.S.C. §103(a) as being unpatentable over *Bacchi* in view of U.S. Patent No. 6,520,727 issued to *Babbs et al.* (“*Babbs*”).

Claims 14-16 depend directly or indirectly from claim 13. Claim 13 recites, among other things, a frame having:

“a structure having an exterior mounting surface secured to said front surfaces of said first, second and third elongated struts and an interior mounting surface secured to said rear surfaces of said first, second and third elongated struts, and providing a first port door storage area located between said exterior mounting surface and said interior mounting surface and said first and second elongated struts and a second port door storage area located between said exterior mounting surface and said interior mounting surface and said second and third elongated struts;”

The apparatus recited in claim 13 is not obvious over *Bacchi*. *Bacchi* does not suggest that the frame 12 include a “port door storage area.” In fact, *Bacchi* teaches away from a “port door storage area” by mounting a linear traveling robot assembly 400 to the rear surface of each mounting plate 14. The linear traveling robot assembly 400 prevents the frame 12 from having any type of “port door storage area.” Therefore, the apparatus recited in claim 13 is not obvious over *Bacchi*. Because claims 14-16 depend from claim 13, claims 14-16 are also not obvious over *Bacchi*.

Moreover, the sorter disclosed in *Babbs* does not provide the elements missing in *Bacchi*. The sorter disclosed in *Babbs*, similar to the load port disclosed in *Bacchi*, simply lowers a port door into the tool. The sorter disclosed in *Babbs* does not teach or suggest that the frame include a "port door storage area." Therefore, Applicants respectfully assert that the apparatus recited in claim 13 is not obvious over *Bacchi* in view of *Babbs*. Because claims 14-16 depend from claim 13, claims 14-16 are also not obvious over *Bacchi* in view of *Babbs*.

Additional Remarks

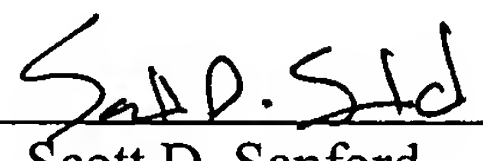
The references cited by the Examiner but not relied upon have been reviewed, but are not believed to render the claims unpatentable, either singly or in combination.

In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent application are allowable, and a Notice of Allowance is requested.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 50-0639 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: May 27, 2005

By: 
Scott D. Sanford
Reg. No. 51,170

Scott D. Sanford, Esq.
O'MELVENY & MYERS LLP
Embarcadero Center West
275 Battery Street, 26th Floor
San Francisco, California 94111-3344
Telephone: (415) 984-8700
Facsimile: (415) 984-8701
Email: ssanford@omm.com

SF1:587875.1